

11-mc-253

DECLARATION OF TODD MARTIN PURSUANT TO 17 U.S.C. § 512(h)

I, Todd Martin, the undersigned, declare that:

1. I am an attorney licensed to practice law in the State of New York and am associated with Fross Zelnick Lehrman & Zissu, P.C. ("FZLZ"), counsel for The Trump Organization and Donald J. Trump (collectively, "Trump"). FZLZ is authorized to act on behalf of Trump on matters involving the infringement of their copyrighted photographs, digital images and sound recordings. This declaration is made in support of the accompanying Subpoena, pursuant to 17 U.S.C. § 512(h)(2)(C).
2. The purpose of the accompanying Subpoenas is to obtain the identity of the alleged copyright infringer who registered and is using IP addresses 184.105.145.21 and 98.126.114.171. The first of these addresses is used in connection with a website that allows users to log in to a website associated with the second IP address. The website associated with the 98.126.114.171 IP address is using, without permission or license, digital images and photographs of two TRUMP properties which are owned by The Trump Organization.
3. The information obtained will be used only for the purpose of protecting the rights granted to our clients under Title 17 of the United States Code.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed at New York, New York, on Thursday, June 30, 2011.

  
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Todd Martin, Esq.

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